



United States
Environmental Protection Agency
Washington, DC 20460

☒ Registration
☐ Amendment
☐ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 87290-	2. EPA Product Manager K. Montague	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Willowood, LLC / Willowood Glufosinate 280SL	PM# 23	
5. Name and Address of Applicant (Include ZIP Code) Willowood, LLC c/o Pyxis Regulatory Consulting, Inc. 4110 136th St. NW Gig Harbor, WA 98332 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. 264-829 Product Name Liberty 280 SL Herbicide	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input checked="" type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

This application falls under Category R300 (44) as it is a new product substantially similar in composition and use to a registered product, only product chemistry data are being submitted and the cite-all method of data support is being used to support product specific acute toxicity data requirements. The fee due is \$1434.00 and the decision timeline is 4 months. A receipt of PRIA pre-payment from pay.gov for the R300 PRIA fee (\$1434.00) is included with this application. Should you have any questions, please contact me at (email) Mike@PyxisRC.com or (phone) 253-853-7369.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input checked="" type="checkbox"/> Metal	
				<input type="checkbox"/> Plastic	
				<input type="checkbox"/> Glass	
				<input type="checkbox"/> Paper	
* Certification must be submitted				Other (Specify) _____	
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container	4. Size(s) Retail Container 1, 2.5, 30, 250 gallons	5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product			
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled			<input type="checkbox"/> Other _____		

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)					
Name Michael Kellogg		Title Agent		Telephone No. (Include Area Code) (253) 853-7339	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.					6. Date Application Received (Stamped)
2. Signature 		3. Title Agent			
4. Typed Name Michael Kellogg		5. Date 6/25/13			



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 1.25 hours per response for registration and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the completed form to this address.

Certification with Respect to Citation of Data

Applicant's/Registrant's Name, Address, and Telephone Number Willowood, LLC c/o Pyxis Regulatory Consulting, Inc.; 4110 136th St. NW Gig Harbor, WA 98332, (253) 853-7369	EPA Registration Number/File Symbol 87290-
Active Ingredient(s) and/or representative test compound(s) Glufosinate	Date June 25, 2013
General Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158) Terrestrial Food/Nonfood	Product Name Willowood Glufosinate 280SL

NOTE: If your product is a 100% repackaging of another purchased EPA-registered product labeled for all the same uses on your label, you do not need to submit this form. You must submit the Formulator's Exemption Statement (EPA Form 8570-27).

☐ I am responding to a Data-Call-In Notice, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

SECTION I: METHOD OF DATA SUPPORT (Check one method only)

☐ I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

☒ I am using the selective method of support (or cite-all option under the selective method), and have included with this form a completed list of data requirements (the Data Matrix form must be used).

SECTION II: GENERAL OFFER TO PAY

[Required if using the cite-all method or when using the cite-all option under the selective method to satisfy one or more data requirements]

☒ I hereby offer and agree to pay compensation, to other persons, with regard to the approval of this application, to the extent required by FIFRA.

SECTION III: CERTIFICATION

I certify that this application for registration, this form for reregistration, or this Data-Call-In response is supported by all data submitted or cited in the application for registration, the form for reregistration, or the Data-Call-In response. In addition, if the cite-all option or cite-all option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses.

I certify that for each exclusive use study cited in support of this registration or reregistration, that I am the original data submitter or that I have obtained the written permission of the original data submitter to cite that study.

I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (i) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (ii) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.

I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.

I certify that the statements I have made on this form and all attachments to it are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Signature 	Date 6/25/13	Typed or Printed Name and Title Michael Kellogg; Agent
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DATA MATRIX

Date	June 25, 2013	EPA Reg No./File Symbol	87290-	Page	1 of 5
Applicant's/Registrant's Name & Address	Willowood, LLC 1600 NW Garden Valley Blvd., Suite 120 Roseburg, OR 97471	Product	Willowood Glufosinate 280SL		
Ingredient	Glufosinate (CAS No. 77182-82-2)				
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
Product Specific Data Requirements					
830.1550	Product Identity and Composition	Volume 1	Willowood, LLC	OWN	
830.1600	Description of Materials Used to Produce the Product	Volume 1	Willowood, LLC	OWN	
830.1620	Description of Production Process				Not required ¹
830.1650	Description of Formulation Process	Volume 1	Willowood, LLC	OWN	
830.1670	Discussion of Formation of Impurities	Volume 1	Willowood, LLC	OWN	
830.1700	Preliminary Analysis				Not required ²
830.1750	Certified Limits	Volume 1	Willowood, LLC	OWN	
830.1800	Enforcement Analytical Method	Volume 1	Willowood, LLC	OWN	
830.6302	Color	Volume 2	Willowood, LLC	OWN	
830.6303	Physical State	Volume 2	Willowood, LLC	OWN	
830.6304	Odor	Volume 2	Willowood, LLC	OWN	
830.6313	Stability to Normal and Elevated Temperatures, Metals, and Metal Ions				Not required ³
830.6314	Oxidation/Reduction: Chemical Incompatibility	Volume 2	Willowood, LLC	OWN	
830.6315	Flammability				Not required ⁴
830.6316	Explosibility				Not required ⁵
Signature			Name and Title	Date	
			Michael Kellogg, Consultant	6/25/13	


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Ingredient	Glufosinate (CAS No. 77182-82-2)				
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.6317	Storage Stability				PRN 92-5 ⁶
830.6319	Miscibility				Not required ⁷
830.6320	Corrosion Characteristics				See endnote ⁶
830.6321	Dielectric Breakdown Voltage				Not required ⁸
830.7000	pH	Volume 2	Willowood, LLC	OWN	
830.7050	UV/Visible Absorption				Not required ³
830.7100	Viscosity	Volume 2	Willowood, LLC	OWN	
830.7200	Melting Point/Melting Range				Not required ³
830.7220	Boiling Point/Boiling Range				Not required ³
830.7300	Density/Relative Density/Bulk Density	Volume 2	Willowood, LLC	OWN	
830.7370	Dissociation Constants in Water				Not required ³
830.7520	Particle size, fiber length, diameter distribution				Not required ⁹
830.7550	Partition Coefficient (n-octanol/water), Shake Flask Method				Not required ³
830.7560	Partition Coefficient (n-octanol/water), Generator Column Method				Not required ³
830.7570	Partition Coefficient (n-octanol/water), Estimation by Liquid Chromatography				Not required ³
Signature		Name and Title	Michael Kellogg, Consultant	Date	6/25/13

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Applicant's/Registrant's Name & Address	Willowood, LLC 1600 NW Garden Valley Blvd., Suite 120 Roseburg, OR 97471	Product	Willowood Glufosinate 280SL		
Ingredient	Glufosinate (CAS No. 77182-82-2)				
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.7840	Water Solubility: Column Elution Method; Shake Flask Method				Not required ³
830.7860	Water Solubility, Generator Column Method				Not required ³
830.7950	Vapor Pressure				Not required ³
870.1100	Acute Oral Toxicity: Rat	Cite-All		PAY	
870.1200	Acute Dermal Toxicity: Rat	Cite-All		PAY	
870.1300	Acute Inhalation Toxicity: Rat	Cite-All		PAY	
870.2400	Primary Eye Irritation: Rabbit	Cite-All		PAY	
870.2500	Primary Dermal Irritation	Cite-All		PAY	
870.2600	Dermal Sensitization	Cite-All		PAY	
Signature	Name and Title Michael Kellogg, Consultant			Date 6/25/13	


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Ingredient	Glufosinate (CAS No. 77182-82-2)			
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status
Willowood Glufosinate 280SL Product Specific Generic Data Requirements				
Willowood, LLC is using the cite-all option under the selective method to satisfy acute toxicity data requirements. Willowood, LLC has made offers-to-pay to the following companies on the April 8, 2013 Data Submitters List for glufosinate.				
Glufosinate Product Specific Data Requirements				
Glufosinate Product Specific Data Requirements	Cite-All		Syngenta Crop Protection, LLC	PAY
Glufosinate Product Specific Data Requirements	Cite-All		Bayer CropScience LP	PAY
Glufosinate Product Specific Data Requirements	Cite-All		Bayer Environmental Science	PAY
Glufosinate Product Specific Data Requirements	Cite-All		Reckitt Benckiser LLC	PAY
Glufosinate Product Specific Data Requirements	Cite-All		Nufarm Limited	PAY
Glufosinate Product Specific Data Requirements	Cite-All		Spray Drift Task Force	PER
Glufosinate Product Specific Data Requirements	Cite-All		Outdoor Residential Exposure Task Force	PER
Signature		Name and Title	Michael Kellogg, Consultant	Date
				6/25/13


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Ingredient	Glufosinate (CAS No. 77182-82-2)	MRID Number		
Guideline Reference Number	Guideline Study Name	Submitter	Status	Note
Glufosinate Product Specific Data Requirements	Cite-All	Agricultural Reentry Task Force	PER	See endnote ¹⁰
Glufosinate Product Specific Data Requirements	Cite-All	FIFRA Endangered Species Task Force, LLC	PAY	
Glufosinate Product Specific Data Requirements	Cite-All	Residential Exposure Joint Venture (REJV)	PAY	
Glufosinate Product Specific Data Requirements	Cite-All	Agricultural Handlers Exposure Task Force	PER	See endnote ¹⁰
Glufosinate Product Specific Data Requirements	Cite-All	Summit Agro North America Holding Corp.	PAY	
Glufosinate Product Specific Data Requirements	Cite-All	Orion GFS, LLC	PAY	
Glufosinate Product Specific Data Requirements	Cite-All	Summit Agro USA, LLC	PAY	
Glufosinate Product Specific Data Requirements	Cite-All	Willowood Glufosinate, LLC	PER	
Glufosinate Generic Data Requirements				
Willowood Glufosinate 280SL qualifies for Formulator's Exemption for glufosinate generic data requirements.				
Signature	Name and Title			Date
	Michael Kellogg, Consultant			6/25/13

Endnotes for Data Matrix for Willowood Glufosinate 280SL

-
- ¹ **830.1620** - Per OPPTS 830.1000, these data are not required for the registration of an end-use product. See 830.1650 for formulation process information.
- ² **830.1700** – This product does not consist solely of the technical grade active ingredient (TGAi) and is not produced by an integrated system, therefore, per OPPTS 830.1700, these data are not required.
- ³ **830.6313, 830.7050, 830.7200, 830.7220, 830.7370, 830.7550, 830.7560, 830.7570, 830.7840, 830.7860 and 830.7950** – Per OPPTS 830.1000, these data are not required for the registration of an end-use product.
- ⁴ **830.6315** – Willowood Glufosinate 280SL contains no flammable ingredients, therefore these data are not required.
- ⁵ **830.6316** – This product does not have explosive characteristics; therefore these data are not required. Please refer to the Confidential Statement of Formula for additional information on the composition of Willowood Glufosinate 280SL.
- ⁶ **830.6317, 830.6320** – Willowood, LLC is currently conducting storage stability and corrosion characteristic studies to satisfy guidelines 830.6317 and 830.6320, respectively. Per PR Notice 92-5, storage stability data are not required to be submitted unless specifically requested by the Agency. OPPTS 830.6317 and 830.6320 guidelines allow the corrosion characteristics study and storage stability study to be conducted simultaneously. Willowood, LLC will submit these data upon completion. As these studies take over a year to complete, Willowood, LLC requests that a conditional registration for Willowood Glufosinate 280SL be granted on the submission of these data.
- ⁷ **830.6319** – Willowood Glufosinate 280SL is not an emulsifiable concentrate and the proposed labeling recommends dilution with water, not oil; therefore, these data are not required.
- ⁸ **830.6321** – This product is not proposed for use around electrical equipment. Therefore, these data are not applicable nor are these data required.
- ⁹ **830.7520** - These data are not required for Willowood Glufosinate 280SL because it is not water insoluble and is not a fibrous material.
- ¹⁰ Willowood, LLC is a member in good standing with this task force.



United States
Environmental Protection Agency
 Washington, DC 20460
Formulator's Exemption Statement
 (40 CFR 152.85)

Applicant's Name and Address Willowood, LLC 1600 NW Garden Valley Blvd., Suite 120 Roseburg, OR 97471	EPA File Symbol/Registration Number 87290-UR
	Product Name Willowood Glufosinate 280SL
	Date of Confidential Statement of Formula (EPA Form 8570-4) 07/10/2013

As an authorized representative of the applicant for registration of the product identified above, I certify that:

- (1) This product contains the following active ingredient(s):

Glufosinate

- (2) Of these, each active ingredient listed in paragraph (4) is present solely as the result of the use of that active ingredient in the manufacturing, formulation or repackaging another product which contains that active ingredient which is registered under FIFRA Section 3, is purchased by us from another person and meets the requirements of 40 CFR section 158.50(e)(2) or (3).

- (3) Indicate by checking (A) or (B) below which paragraph applies:

- ☒ (A) An accurate Confidential Statement of Formula (EPA FORM 8570-4) for the above identified product is attached to this statement.

That formula statement indicates, by company name, registration number, and product name, the source of the active ingredient(s) listed in paragraph (1).

OR

- ☐ (B) The Confidential Statement of Formula (CSF)(EPA Form 8570-4) referenced above and on file with the EPA is complete, current, an accurate and contains the information required on the current CSF.

- (4) The following active ingredients in this product qualify for the formulator's exemption.

Source

Active Ingredient	Product Name	Registration Number
Glufosinate	[REDACTED]	[REDACTED]

Signature 	Name and Title Michael Kellogg / Agent	Date 10/29/13
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EPA Form 8570-27 (Rev. 06-2004)

Copy 1 - EPA
Copy 2 - Applicant copy

Product ingredient source information may be entitled to confidential treatment